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DISTRICT OF NEW JERSEY
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OCERTIFIED BY THE SUPREME COURT OF
NEW JERSEY AS A CIVIL TRIAL ATTORNEY

o Member of the New Jersey, New York Bars.
+ Member of the New Jersey Bar
□ Member of the New Jersey, Pennsylvania Bars
Δ Pending Membership of the New Jersey Bar

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May 30, 2017

VIA FACSIMILE AND REGULAR MAIL

Honorable Michael A. Shipp
United States District Court-Newark
M.L. King Jr. Fed. Bldg & U.S. Courthouse
50 Walnut Street, P.O. Box 419
Newark, NJ 07101

RECEIVED

JUN 20 2017

AT 8:30
WILLIAM T. WALSH
CLERK

Re: Rebecca Musarra v. State of New Jersey, et al.
Docket No. 3:16-cv-00485-MAS-DEA

Dear Judge Shipp:

As you are aware this firm represents the Plaintiff in the above indicated matter. On April 28, 2017, the Court entered a "60 Day Order" in this matter as it had been reported that the parties resolved the matter. Since that time the parties have not completed the written agreement and release and given subsequent timing for payment, Plaintiff is concerned that the settlement may not be complete by June 28, 2017. Accordingly, Plaintiff respectfully requests that the Court's Order of April 28, 2017 be vacated, or, in the alternative, that the timeframes within that Order be extended by an additional 60 days.

We thank the Court for its attention to this matter.

Respectfully submitted,

COSTELLO & MAINS, LLC

By: 

Daniel T. Silverman

DTS/at

cc: Rebecca Musarra – via email

Kevin Dronson, Esquire – via email and regular mail

*So Ordered -
DTS for us.*

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